

EXHIBIT 2

1 UNITED STATES DISTRICT COURT
 2 FOR THE NORTHERN DISTRICT OF GEORGIA
 3 ATLANTA DIVISION

4 JAMIE LEE ANDREWS, AS)
 5 SURVIVING SPOUSE OF MICAH LEE) DOCKET NO. 1:14-CV-3432-SCJ
 6 ANDREWS, DECEASED, AND JAMIE) VOLUME 3 - A.M.
 7 LEE ANDREWS, AS ADMINISTRATOR)
 8 OF THE ESTATE OF MICAH LEE)
 9 ANDREWS, DECEASED,)
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TRANSCRIPT OF NON-JURY TRIAL PROCEEDINGS
 BEFORE THE HONORABLE STEVE C. JONES
 UNITED STATES DISTRICT JUDGE
 WEDNESDAY, OCTOBER 6, 2021

APPEARANCES:

ON BEHALF OF THE PLAINTIFF:

TEDRA L. CANNELLA, ESQ.
 JAMES E. BUTLER, JR., ESQ.
 RORY A. WEEKS, ESQ.
 MICHAEL F. WILLIFORD, ESQ.

ON BEHALF OF THE DEFENDANT:

DOUGLAS G. SCRIBNER, ESQ.
 WILLIAM J. REPKO, III, ESQ.
 JENNY A. HERGENROTHER, ESQ.

VIOLA S. ZBOROWSKI, CRR, CRC, CMR, FAPR
 OFFICIAL COURT REPORTER
 UNITED STATES DISTRICT COURT
 ATLANTA, GEORGIA

1 restraint system in the Mazda3?

2 **A.** Well, it was probably broken into pieces, because I'm assuming
3 Bosch was also a full system supplier for crash sensing. And then
4 Autoliv was a full system supplier for the restraints themselves.
5 That's my understanding.

6 **Q.** And what parts of the airbag did Bosch supply?

7 **A.** As far as I recall, it was just the crash sensing system. So
8 it would be the SAUS system, the ACM, airbag control module, it
9 would have been all of the satellite sensors.

10 **Q.** Was it Bosch's component that caused the non-deployment of the
11 airbag?

12 **A.** Ultimately, yes, but it was the connector and the wire
13 connected to that sensor that failed, not the sensor itself.

14 **Q.** And you viewed all of the algorithms that Bosch did -- well,
15 not the algorithms, but you reviewed the crash data that Bosch
16 produced testing their algorithms?

17 **A.** Yes.

18 **Q.** And did you make a conclusion based on that review whether
19 Bosch's algorithm was defective?

20 **A.** Correct, I did. I felt that if the wire had not been cut, the
21 system was designed reasonably well, it would have deployed the
22 airbags.

23 **Q.** Did you determine whether it was Bosch's fault that the wire
24 got cut or the sensor came apart?

25 **A.** It was a combination of Mazda's decision on how to route the

1 wire and the decision to use this substandard connector.

2 Q. And using the connector was Mazda's decision or Bosch's
3 decision?

4 A. From what I garnered from all of the documentation that I
5 read, it was Mazda's decision.

6 Q. You didn't have a document that you could hold up and show
7 this is Bosch's fault, at least in part?

8 A. Correct, I could not. I was looking for something in their
9 FMEAs and other documents that would show that they actually took
10 part in the testing or the connector and the wire system, they
11 were not. Somebody else at Mazda or the sub-supplier was doing
12 that testing.

13 Q. And you mentioned FMEAs. What are those?

14 A. It's a -- basically, a failure mode and effects analysis.
15 It's a document that we engineers put together where we,
16 basically, list all of the potential failure modes that we can
17 think of, and then we put together solutions to prevent those
18 failure modes and then we implement those solutions. And when I
19 look at the FEMAs from Bosch, they were only held responsible
20 specifically for the crash sensor itself, the SAS module in the
21 passenger compartment and the upfront sensor. There was nothing
22 in their documentation about the connector, because it was not
23 something that they were supplying.

24 Q. Okay. And did Bosch talk to Mazda about using two upfront
25 sensors?